



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

TO: Interested Parties / Applicant

DATE: October 2, 2009

RE: ADM Grain / 163-28381-00042

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 12/3/07



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Miranda Gerard
ADM Grain Company
4666 Faries Pkwy
Decatur, Illinois 62526

October 2, 2009

Re: 163-28381-00042
First Minor Permit Revision to
M163-20504-00042

Dear Miranda Gerard:

ADM Grain Company was issued a Minor Source Operating Permit (MSOP) No. M163-20504-00042 on December 17, 2007 for a stationary country grain elevator located at 2350 Broadway Avenue, Evansville, Indiana 47712. On August 25, 2009, the Office of Air Quality (OAQ) received an application from the source requesting to handle 100,000 tons per year of bulk materials. The bulk materials will be received by truck, dumped into the truck receiving pit, and then direct to barge load-out. The Bulk Materials include grain by-products and soybean by-products. The attached Technical Support Document (TSD) provides additional explanation of the changes to the source/permit. Pursuant to the provisions of 326 IAC 2-6.1-6(g)(4)(A), because the revision involves modifications that have a potential to emit (PTE) of less than twenty-five (25) tons per year and equal to or greater than five (5) tons per year of either particulate matter (PM) or particulate matter less than ten (10) microns (PM10), a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document (TSD).

Pursuant to 326 IAC 2-6.1-6, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Attached please find the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Jeff Scull, of my staff, at 317-234-6544 or 1-800-451-6027, and ask for extension 4-6544.

Sincerely,

Alfred C. Dumauel, Ph. D., Section Chief
Permits Branch
Office of Air Quality

Attachments: Technical Support Document, updated emission calculations, and revised permit

ACD/jws

cc: File - Vanderburgh County
Vanderburgh County Health Department
U.S. EPA, Region V
Compliance and Enforcement Branch
Billing, Licensing and Training Section



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**Minor Source Operating Permit
OFFICE OF AIR QUALITY**

**ADM Grain Company
2350 Broadway Avenue
Evansville, Indiana 47712**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a MSOP under 326 IAC 2-6.1.

Operation Permit No.: M163-20504-00042	
Signed and Issued by: Matthew Stuckey, Deputy Branch Chief Permits Branch Office of Air Quality	Issuance Date: December 17, 2007 Expiration Date: December 17, 2012

First Notice Only Change No.: M163-27136-00042 Issuance Date: December 11, 2008
Second Notice Only Change No.: M163-27399-00042 Issuance Date: February 2, 2009

First Minor Permit Revision No.: M163-28381-00042	
Issued by:  Alfred C. Dumauval, PH. D., Section Chief Permits Branch Office of Air Quality	Issuance Date: October 2, 2009 Expiration Date: December 17, 2012

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]

The Permittee owns and operates a country grain elevator operation handling grain, and bulk materials, including corn by-products and soybean products.

Source Address:	2350 Broadway Avenue, Evansville, Indiana 47712
Mailing Address:	4666 Faries Parkway, Decatur, IL 62526
General Source Phone Number:	812-424-3581
SIC Code:	5153
County Location:	Vanderburgh
Source Location Status:	Non-attainment for PM 2.5 standard Attainment for all other criteria pollutants
Source Status:	Minor Source Operating Permit Program Minor Source, under PSD and Emission Offset Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This source consists of the following emission units and pollution control devices:

- (a) Two (2) truck receiving facilities, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum throughput of 20,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (b) One (1) truck receiving facility, identified as Pit # 3, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (c) Two (2) truck loadout areas, identified as EP-03, constructed in 1949, with a maximum throughput of 10,000 bushels of grain per hour and exhausting to baghouse # 2 for pollution control.
- (d) One (1) rail loadout, identified as EP-05, constructed in 1990, with a maximum throughput of 22,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (e) One (1) barge loadout, identified as EP-04, constructed in 1979, with a maximum throughput of 36,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 mmBtu/hour burner, with a maximum throughput of 3,000 bushels of grain per hour.
- (g) One (1) grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 10,000 bushels of grain per hour.

- (h) Seven (7) bucket elevators associated with fully enclosed conveyor belts, known as internal handling, identified as EP-08, constructed between 1949 to 2001, with a maximum throughput of 24,000 bushels of grain per hour, exhausting to baghouse # 1 and # 2 for pollution control.
- (i) Three (3) storage bins, identified as bins #2, #3, and #4, each with a maximum capacity of 15,018 bushels of grain.
- (j) Two (2) storage bins, identified as bins #5 and #10, each with a maximum capacity of 3,739 bushels of grain.
- (k) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 4,541 bushels of grain.
- (l) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 1,910 bushels of grain.
- (m) One (1) storage bin, identified as bin #13, with a maximum capacity of 2,750 bushels of grain.
- (n) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 16,634 bushels of grain.
- (o) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 5,136 bushels of grain.
- (p) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 13,085 bushels of grain.
- (q) One (1) storage bin, identified as bin #500, with a maximum capacity of 21,383 bushels of grain.
- (r) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 21,675 bushels of grain.
- (s) Eight (8) storage bins, identified as bins # 502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 21,993 bushels of grain.
- (t) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 14,323 bushels of grain.
- (u) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 14,492 bushels of grain.
- (v) One (1) storage bin, identified as bin #605, with a maximum capacity of 6,745 bushels of grain.
- (w) One (1) storage bin, identified as bin #700, with a maximum capacity of 21,940 bushels of grain.
- (x) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 146,000 bushels of grain.
- (y) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (z) Haul roads, identified as EP-09. [326 IAC 6-4]

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-1.1-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-1.1-1) shall prevail.

B.2 Permit Term [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5][IC 13-15-3-6(a)]

- (a) This permit, M163-20504-00042, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Severability

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Provide Information

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Certification

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an "authorized individual" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An "authorized individual" is defined at 326 IAC 2-1.1-1(1).

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) An annual notification shall be submitted by an authorized individual to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) The annual notice shall be submitted in the format attached no later than March 1 of each year to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251
- (c) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs) including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to M163-20504-00042 and issued pursuant to permitting programs approved into the state implementation plan have been either:
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.12 Termination of Right to Operate [326 IAC 2-6.1-7(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least ninety (90) days prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-6.1-7.

B.13 Permit Renewal [326 IAC 2-6.1-7]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-6.1-7. Such information shall be included in the application for each emission unit at this source. The renewal application does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

- (b) A timely renewal application is one that is:
 - (1) Submitted at least ninety (90) days prior to the date of the expiration of this permit; and
 - (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-6.1 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

B.14 Permit Amendment or Revision [326 IAC 2-5.1-3(e)(3)][326 IAC 2-6.1-6]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.15 Source Modification Requirement

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2.

B.16 Inspection and Entry

[326 IAC 2-5.1-3(e)(4)(B)][326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2][IC 13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.17 Transfer of Ownership or Operational Control [326 IAC 2-6.1-6]

(a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement notice-only changes addressed in the request for a notice-only change immediately upon submittal of the request. [326 IAC 2-6.1-6(d)(3)]

B.18 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following numbers: 1-800-451-6027 or 317 233-4230 (as for Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.19 Credible Evidence [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

C.1 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on December 09, 2004. The plan is included as Attachment A.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using ambient air quality modeling pursuant to 326 IAC 1-7-4.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-6.1-5(a)(2)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

C.11 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Instrument Specifications [326 IAC 2-1.1-11]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps

C.14 Response to Excursions or Exceedances

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.
- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records; and/or

- (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

C.16 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.17 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.
- (e) The Permittee shall make the information required to be documented and maintained in accordance with (c) in Section C- General Record Keeping Requirements available for review upon a request for inspection by IDEM, OAQ. The general public may request this information from the IDEM, OAQ under 326 IAC 17.1.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description:

Facility Description [326 IAC 2-7-5(15)]: Grain Elevator Operations

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) truck receiving facilities, identified as Pit # 1 and # 2, constructed in 1988 and 1949, respectively, each with a maximum throughput of 20,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (b) One (1) truck receiving facility, identified as Pit # 3, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour, exhausting to baghouse # 2 for pollution control.
- (c) Two (2) truck loadout areas, identified as EP-03, constructed in 1949, with a maximum throughput of 12,000 bushels of grain per hour and exhausting to baghouse # 2 for pollution control.
- (d) One (1) rail loadout, identified as EP-05, constructed in 1990, with a maximum throughput of 22,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control.
- (e) One (1) barge loadout, identified as EP-04, constructed in 1979, with a maximum throughput of 36,000 bushels of grain per hour, exhausting to baghouse # 1 for pollution control and a 14,500 cubic foot per minute (CFM) booster fan, installed in 2009, attached to the existing dust collection system near the midpoint of the barge load out bridge tower for improved dust collection.
- (f) One (1) natural gas column grain dryer, identified as EP-06, constructed in 1996, with a 31.6 mmBtu/hour burner and a maximum throughput of 3,000 bushels of grain per hour.
- (g) One (1) grain cleaner, identified as EP-07, constructed in 1989, with a maximum throughput of 10,000 bushels of grain per hour.
- (h) Seven (7) bucket elevators associated with fully enclosed conveyor belts, known as internal handling, identified as EP-08, constructed between 1949 to 2001, with a maximum throughput of 24,000 bushels of grain per hour, exhausting to baghouse # 1 and # 2 for pollution control.
- (i) Three (3) storage bins, identified as bins #2, # 3, and #4, each with a maximum capacity of 15,018 bushels of grain.
- (j) Two (2) storage bins, identified as bins # 5 and #10, each with a maximum capacity of 3,739 bushels of grain.
- (k) Four (4) storage bins, identified as bins #6, #7, #8, and #9, each with a maximum capacity of 4,541 bushels of grain.
- (l) Two (2) storage bins, identified as bins #11 and #12, each with a maximum capacity of 1,910 bushels of grain.

- (m) One (1) storage bin, identified as bin #13, with a maximum capacity of 2,750 bushels of grain.
- (n) Ten (10) storage bins, identified as bins #100, #101, #102, #103, #104, #300, #301, #302, #303, and #304, each with a maximum capacity of 16,634 bushels of grain.
- (o) Two (2) storage bins, identified as bins #200 and #205, each with a maximum capacity of 5,136 bushels of grain.
- (p) Four (4) storage bins, identified as bins #201, #202, #203, and #204, each with a maximum capacity of 13,085 bushels of grain.
- (q) One (1) storage bin, identified as bin #500, with a maximum capacity of 21,383 bushels of grain.
- (r) Two (2) storage bins, identified as bins #501 and #701, each with a maximum capacity of 21,675 bushels of grain.
- (s) Eight (8) storage bins, identified as bins #502, #503, #504, #505, #702, #703, #704, and #705, each with a maximum capacity of 21,993 bushels of grain.
- (t) Three (3) storage bins, identified as bins #600, #601, and #602, each with a maximum capacity of 14,323 bushels of grain.
- (u) Two (2) storage bins, identified as bins #603 and #604, each with a maximum capacity of 14,492 bushels of grain.
- (v) One (1) storage bin, identified as bin #605, with a maximum capacity of 6,745 bushels of grain.
- (w) One (1) storage bin, identified as bin #700, with a maximum capacity of 21,940 bushels of grain.
- (x) Two (2) storage bins, identified as bins #801 and #802, each with a maximum capacity of 146,000 bushels of grain.
- (y) One (1) storage bin, identified as bin #1 that is used to weigh product only.
- (z) Haul roads, identified as EP-09. [326 IAC 6-4]

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.1.1 Vanderburgh County Particulate Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(a), particulate matter emissions from the facilities shall be limited to 0.03 grains per dry standard cubic foot (gr/dscf).

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and their control devices.

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

D.1.3 Visible Emissions Notations

- (a) Visible emission notations of baghouses # 1 and # 2 stack exhausts shall be performed once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

D.1.4 Parametric Monitoring

The Permittee shall record the pressure drop across baghouses # 1 and # 2 used in conjunction with the truck receiving facilities, rail loadout, truck loadout, barge loadout, grain cleaner, and internal handling operations, at least once per day when the grain handling processes are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 0.5 and 4.5 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C – Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C – Response to Excursions and Exceedances shall be considered a deviation from this permit.

The instrument used for determining pressure shall comply with Section C.12 – Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.5 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an excursion or exceedance and the Permittee satisfies the excursion or exceedance provisions of this permit (Section C – Response to Excursions or Exceedances). Within eight (8) business hours of the determination of failure, response steps according to the Response to Excursions or Exceedances condition shall be initiated.
- (b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as a malfunction and the Permittee satisfies the requirements of Section C – Malfunctions Report).

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2), 326 IAC 2-6.1-5]

D.1.6 Record Keeping Requirements

- (a) To document compliance with Condition D.1.3, the Permittee shall maintain a daily record of visible emission notations of both baghouse stack exhausts. The Permittee shall include in each daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (e.g. the process did not operate that day).
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain a daily record of pressure drop reading across each baghouse. The Permittee shall include in each daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (e.g. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C – General Record Keeping Requirements of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**MINOR SOURCE OPERATING PERMIT (MSOP)
CERTIFICATION**

Source Name: ADM Grain Company
Source Address: 2350 Broadway Avenue, Evansville, IN 47712
Mailing Address: 4666 Faries Parkway, Decatur, IL 62526
MSOP No.: M163-20504-00042

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- Annual Compliance Notification
- Test Result (specify) _____
- Report (specify) _____
- Notification (specify) _____
- Affidavit (specify) _____
- Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

MALFUNCTION REPORT

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER – (317) 233-6865**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/19____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/19____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:
CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____
INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY
COMPLIANCE AND ENFORCEMENT BRANCH
MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	ADM Grain Company
Address:	2350 Broadway Avenue
City:	Evansville, IN 47712
Phone #:	(812) 424-3581
MSOP #:	M163-20504-00042

I hereby certify that ADM Grain Company is

- still in operation.
- no longer in operation.

I hereby certify that ADM Grain Company is

- in compliance with the requirements of MSOP 163-20504-00042.
- not in compliance with the requirements of MSOP 163-20504-00042.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

Attachment A:

Fugitive Particulate Matter Emission Control Plan

**ADM Grain Company
2350 Broadway
Evansville, IN 47712**

Minor Source Operating Permit (MSOP) No. 163-20504-00042

Attachment A Fugitive Dust Plan



**ADM Grain Company
2350 Broadway
Evansville, IN 47712**

Procedure for Dust Control on Unpaved Driveway

Purpose: Control fugitive emissions from the unpaved roadways

Water, Asphalt Emulsion or an equivalent material will be used to control dust from unpaved driveways. This will be done on as needed basis to control nuisance dust.

If Asphalt Emulsion or an equivalent material is applied the following must happen:

1. Gravel driveway must be graded and worked to bring loose gravel to the top
2. Soapstock or equivalent material will then be applied to the driveway
3. Temperature must be above 70 degrees F to allow the material to be absorbed into the drive
4. Traffic must be restricted from the driveway for 3 days to allow the material to set-up
5. The driveway must be dry when applying the soapstock.

**Indiana Department of Environmental Management
Office of Air Quality**

Technical Support Document (TSD) for a Minor Permit Revision to a Minor
Source Operating Permit (MSOP)

Source Description and Location

Source Name:	ADM Grain Company
Source Location:	2350 Broadway Avenue, Evansville, Indiana 47712
County:	Vanderburgh
SIC Code:	5153
Operation Permit No.:	M163-20504-00042
Operation Permit Issuance Date:	December 17, 2007
Minor Permit Revision No.:	163-28381-00042
Permit Reviewer:	Jeff Scull

On August 25, 2009, the Office of Air Quality (OAQ) received an application from ADM Grain Company related to a modification to an existing a stationary country grain elevator.

Existing Approvals

The source was issued MSOP No. M163-20504-00042 on December 17, 2007. The source has since received the following approvals:

- (a) First Notice-Only Change No. 163-27136-00042, issued on December 11, 2008; and
- (b) Second Notice-Only Change No. 163-27399-00042, issued on February 2, 2009.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Designation
SO ₂	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O ₃	Attainment effective January 30, 2006, for the Evansville area, including Vanderburgh County, for the 8-hour ozone standard. ¹
PM ₁₀	Unclassifiable effective November 15, 1990.
NO ₂	Cannot be classified or better than national standards.
Pb	Not designated.

¹Attainment effective October 18, 2000, for the 1-hour ozone standard for the Evansville area, including Vanderburgh County, and is a maintenance area for the 1-hour ozone National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour designation was revoked effective June 15, 2005.

Basic nonattainment designation effective federally April 5, 2005, for PM_{2.5}.

- (a) **Ozone Standards**
 Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to ozone. Vanderburgh County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) **PM2.5**
 U.S. EPA, in the Federal Register Notice 70 FR 943 dated January 5, 2005, has designated Vanderburgh County as nonattainment for PM2.5. On March 7, 2005 the Indiana Attorney General's Office, on behalf of IDEM, filed a law suit with the Court of Appeals for the District of Columbia Circuit challenging U.S. EPA's designation of nonattainment areas without sufficient data. However, in order to ensure that sources are not potentially liable for a violation of the Clean Air Act, the OAQ is following the U.S. EPA's New Source Review Rule for PM2.5 promulgated on May 8, 2008, and effective on July 15 2008. Therefore, direct PM2.5 and SO2 emissions were reviewed pursuant to the requirements of Nonattainment New Source Review, 326 IAC 2-1.1-5. See the State Rule Applicability – Entire Source section.
- (c) **Other Criteria Pollutants**
 Vanderburgh County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Fugitive Emissions

- (a) The fugitive emissions of criteria pollutants and hazardous air pollutants are counted toward the determination of 326 IAC 2-6.1 (Minor Source Operating Permits) applicability.
- (b) Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2, 326 IAC 2-3, or 326 IAC 2-7, and there is no applicable New Source Performance Standard that was in effect on August 7, 1980, fugitive emissions are not counted toward the determination of PSD, Emission Offset, and Part 70 Permit applicability.

Status of the Existing Source

The table below summarizes the potential to emit of the entire source, prior to the proposed revision, after consideration of all enforceable limits established in the effective permits:

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Receiving(Straight Truck)	63.5	20.8	20.8	-	-	-	-	-	-
Internal Handling	21.5	12.0	12.0	-	-	-	-	-	-
Cleaning	26.4	6.6	6.6	-	-	-	-	-	-
Drying	77.5	19.4	19.4	<0.1	14.0	0.4	4.9	0.26	Hexane 0.25
Storage Bin Vents	8.8	2.2	2.2	-	-	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source Prior to Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Shipping (Truck)	30.3	10.2	10.2	-	-	-	-	-	-
Haul Roads	3.8	0.8	0.8	-	-	-	-	-	-
Total PTE of Entire Source	231.9	72	72	<0.1	14.0	0.4	4.9	0.26	Hexane 0.25
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA

negl. = negligible
 These emissions are based upon the TSD Appendix A emission calculations from MSOP No. M163-20504-00042, issued on December 17, 2007.

Description of Proposed Revision

The Office of Air Quality (OAQ) has reviewed an application, submitted by ADM Grain Company on August 25, 2009, requesting to handle 100,000 tons per year of bulk materials in addition to the existing grain throughput. The bulk materials will be received by truck, dumped into the truck pit, and sent straight out to barge load-out. The Bulk Materials include grain by-products and soybean by-products.

There are no new emission units and/or pollution control devices associated with this modification.

Enforcement Issues

There are no pending enforcement actions related to this revision.

Emission Calculations

See Appendix A of this TSD for detailed emission calculations.

Permit Level Determination – MSOP Revision

The following table is used to determine the appropriate permit level under 326 IAC 2-6.1-6. This table reflects the PTE before controls of the proposed revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Process/ Emission Unit	PTE of Proposed Revision (tons/year)								
	PM	PM10*	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Receiving	9	2.9	2.9	-	-	-	-	-	-
Barge Loadout	0.8	1.5	1.5	-	-	-	-	-	-

Process/ Emission Unit	Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Emission Offset/ Nonattainment NSR Major Source Thresholds	100	100	100	100	100	100	100	NA	NA
negl. = negligible These emissions are based upon the TSD Appendix A emission calculations from MSOP No. M163-20504-00042, issued on December 17, 2007.									

** Permit M163-20504-00042, issued on December 17, 2007, emission calculations considered truck shipping for the grain, because shipping by truck produces more particulate emissions than shipping by railcar or barge. To constitute realistic maximum particulate emissions IDEM assumed all grain would be shipped by truck. The new bulk products will only be shipped by barge, therefore only barge loadout emission factors were used for the new bulk materials.

The table below summarizes the potential to emit of the entire source after issuance of this revision, reflecting all limits, of the emission units. Any control equipment is considered federally enforceable only after issuance of this MSOP permit revision, and only to the extent that the effect of the control equipment is made practically enforceable in the permit. (Note: the table below was generated from the above table, with bold text un-bolded and strikethrough text deleted)

Process/ Emission Unit	Potential To Emit of the Entire Source After Revision (tons/year)								
	PM	PM10	PM2.5	SO ₂	NO _x	VOC	CO	Total HAPs	Worst Single HAP
Receiving(Straight Truck)	72.5	23.7	23.7	-	-	-	-	-	-
Internal Handling	24.6	13.7	13.7	-	-	-	-	-	-
Cleaning	26.4	6.6	6.6	-	-	-	-	-	-
Drying	77.5	19.4	19.4	<0.1	14.2	0.4	4.9	0.26	Hexane 0.25
Storage Bin Vents	8.8	2.2	2.2	-	-	-	-	-	-
Shipping (Truck and Barge Loadout)	31.1	11.7	11.7	-	-	-	-	-	-
Haul Roads	7.4	1.7	1.7	-	-	-	-	-	-
Total PTE of Entire Source	248.3	79.0	79.0	<0.1	14.2	0.4	4.9	0.26	Hexane 0.25
Title V Major Source Thresholds	NA	100	100	100	100	100	100	25	10
PSD Major Source Thresholds	250	250	250	250	250	250	250	NA	NA
negl. = negligible These emissions are based upon the TSD total potential to emit table and TSD Appendix A emission calculations from MSOP No. M163-20504-00042, issued on December 17, 2007.									

** Permit M163-20504-00042, issued on December 17, 2007, emission calculations considered truck loadout for the grain, because shipping by truck produces more particulate emissions than shipping by

railcar or barge. To constitute realistic maximum particulate emissions IDEM assumed all grain would be shipped by truck. The new bulk products will only be shipped by barge, therefore only barge loadout emission factors were used for the new bulk materials.

MSOP Status

This revision to an existing Title V minor stationary source will not change the minor status, because the uncontrolled/unlimited potential to emit criteria pollutants from the entire source will still be limited to less than the Title V major source threshold levels. Therefore, the source will still be subject to the provisions of 326 IAC 2-6.1 (MSOP).

Federal Rule Applicability Determination

New Source Performance Standards (NSPS)

- (a) The requirements of the NSPS (40 CFR Part 60, Subpart DD) for Grain Elevators (326 IAC 12) are not included in this permit because the source has a permanent storage capacity less than 2.5 million U.S. bushels. The maximum storage capacity of the source is 0.68 million U.S. bushels.
- (b) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included for this proposed revision.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

- (c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20 and 40 CFR Part 63) included for this proposed revision.

Compliance Assurance Monitoring (CAM)

- (d) Pursuant to 40 CFR 64.2, Compliance Assurance Monitoring (CAM) is not included in the permit, because the unlimited potential to emit of the source is less than the Title V major source thresholds and the source is not required to obtain a Part 70 or Part 71 permit.

State Rule Applicability Determination

The following state rules are applicable to the proposed revision:

- (a) 326 IAC 2-6.1 (Minor Source Operating Permits (MSOP))
MSOP applicability is discussed under the Permit Level Determination – MSOP section above.
- (b) 326 IAC 2-2 (Prevention of Significant Deterioration(PSD))
This modification to an existing PSD minor stationary source will not change the PSD minor status, because the potential to emit of all attainment regulated pollutants from the entire source will continue to be less than 250 tons per year, and this source is not one of the twenty-eight (28) listed source categories, as specified in 326 IAC 2-2-1(gg)(1). Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.
- (c) 326 IAC 2-3 (Emission Offset)
This modification to an existing Emission Offset minor stationary source will not change the Emission Offset minor status, because the potential to emit of all nonattainment regulated pollutants from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

This modification to an existing minor stationary source under 326 IAC 2-1.1-5 (Nonattainment New Source Review) will not change the minor status, because the potential to emit of PM2.5

from the entire source will continue to be less than 100 tons per year. Therefore, pursuant to 326 IAC 2-1.1-5, the Nonattainment New Source Review requirements do not apply. See PTE of the Entire Source After Issuance of the MSOP Revision Section above.

- (d) 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))
The proposed revision is not subject to the requirements of 326 IAC 2-4.1, since the unlimited potential to emit of HAPs is less than ten (10) tons per year for any single HAP and less than twenty-five (25) tons per year of a combination of HAPs.
- (e) 326 IAC 2-6 (Emission Reporting)
Pursuant to 326 IAC 2-6-1, this source is not subject to this rule, because it is not required to have an operating permit under 326 IAC 2-7 (Part 70), it is not located in Lake, Porter, or LaPorte County, and it does not emit lead into the ambient air at levels equal to or greater than 5 tons per year. Therefore, 326 IAC 2-6 does not apply.
- (f) 326 IAC 5-1 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.
- (g) 326 IAC 6-4 (Fugitive Dust Emissions Limitations)
Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions Limitations), the source shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.
- (h) 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)
Pursuant to 326 IAC 6-5-1(a)(2)(E), the source is subject to this rule because it is a source of fugitive particulate matter (PM) emissions greater than 25 tons per year and the source is located in the city of Evansville.

This rule requires a fugitive dust plan to be submitted. The plan, was received on December 9, 2004. The source shall comply with all dust abatement measures contained therein.

Records shall be kept and maintained to document all control measures and activities to be implemented in accordance with the control plan. Records shall be available upon the request of the commissioner, and shall be retained for three (3) years. A copy of the plan has been include as attachment A to the permit.

- (i) 326 IAC 6.5-1-2 (Particulate Limitations except Lake County)
This source is subject to the requirements of 326 IAC 6.5-1-2 (Particulate matter limitations except Lake County) because this source is located in one of the counties listed in 326 IAC 6.5-1-1(a), is not specifically listed in 326 IAC 6.5-2 through 326 IAC 6.5-10, and actual PM emissions exceed 10 tons per year.

This source is not subject to the requirements of 326 IAC 6.5-1-2(d) because this grain processing source has a permanent grain storage capacity of less than 1.0 million U.S. bushels. The maximum storage capacity of the source is 0.68 million U.S. bushels.

- (j) 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)
Pursuant to 326 IAC 6-3-1(c)(3), this rule does not apply if the limitation established in by 326 IAC 6-3-2 are less stringent than applicable limitation established in 326 IAC 6.5. Since the applicable PM emission limits established by 326 IAC 6.5-1-2 for each facility are less than the PM limits that would be established by 326 IAC 6-3-2, therefore the limits pursuant to 326 IAC 6-3-2 do not apply.

Compliance Determination, Monitoring and Testing Requirements

The existing compliance requirements will not change as a result of this revision. The source shall continue to comply with the applicable requirements and permit conditions as contained in MSOP No: M163-20504-00042 on December 17, 2007.

Proposed Changes

- (a) The following changes listed below are due to the proposed revision. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
- (1) Change in descriptive information in condition A.1.
- A.1 General Information [326 IAC 2-5.1-3(c)][326 IAC 2-6.1-4(a)]
-
- The Permittee owns and operates a country grain elevator operation **handling grain, and bulk materials, including corn by-products and soybean products.**
- (b) Upon further review, IDEM, OAQ has decided to make the following changes to the permit. Deleted language appears as ~~strikethrough~~ text and new language appears as **bold** text:
- (1) The addition of an Attachment A, the Fugitive Particulate Matter Emission Control Plan. This plan was included at the end of the previous permit. Current practice is to include the plan as an attachment. The Table of Contents has been modified to reflect this change as well.

Attachment A:

Fugitive Particulate Matter Emission Control Plan

**ADM Grain Company
2350 Broadway Avenue
Evansville, Indiana 47712**

Minor Source Operating Permit (MSOP) No. 163-20504-00042

- (2) Several of IDEM's branches and sections have been renamed. Therefore, IDEM has updated the addresses listed in the permit. References to "Permit Administration and Development Section" and the "Permits Branch" have been changed to "Permit Administration and Support Section". References to "Asbestos Section", "Compliance Data Section", "Air Compliance Section", and "Compliance Branch" have been changed to "Compliance and Enforcement Branch". This change has been made throughout the permit, below are two examples:

Indiana Department of Environmental Management
Permit Administration and Support Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Conclusion and Recommendation

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant. An application for the purposes of this review was received on August 25, 2009.

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed MSOP Minor Revision No. 163-28381-00042. The staff recommends to the Commissioner that this MSOP Minor Revision be approved.

IDEM Contact

- (a) Questions regarding this proposed permit can be directed to Jeff Scull at the Indiana Department Environmental Management, Office of Air Quality, Permits Branch, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251 or by telephone at (317) 234-6544 or toll free at 1-800-451-6027 extension 4-6544.
- (b) A copy of the findings is available on the Internet at: <http://www.in.gov/ai/appfiles/idem-caats/>
- (c) For additional information about air permits and how the public and interested parties can participate, refer to the IDEM's Guide for Citizen Participation and Permit Guide on the Internet at: www.idem.in.gov

Appendix A: Emission Calculations

Bulk Products

Company Name: ADM Grain Company

Address: 2350 Broadway Avenue, Evansville, IN 47712

MSOP: 163-28381-00042

Reviewer: Jeff Scull

Date: September 9, 2009

Potential to Emit for Modification (New Bulk Products)

Uncontrolled Potential To Emit (tons/year)							
Process/emission unit	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Receiving	9.00	2.95	-	-	-	-	-
Barge Loadout	0.80	1.45	-	-	-	-	-
Internal Handling	3.05	1.70	-	-	-	-	-
Unpaved Roads	3.54	0.90	-	-	-	-	-
TOTAL =	16.39	7.00	0.00	0.00	0.00	0.00	0.00

Potential to Emit After Controls (tons/year)							
Process/emission unit	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Receiving	0.09	0.03	-	-	-	-	-
Barge Loadout	0.01	0.01	-	-	-	-	-
Internal Handling	0.03	0.02	-	-	-	-	-
Unpaved Roads	2.33	0.59	-	-	-	-	-
TOTAL =	2.46	0.65	0.00	0.00	0.00	0.00	0.00

Potential to Emit for Entire Source (After Modification)

Uncontrolled Potential To Emit of Existing Source & New Bulk Products (tons/year)							
Operation	PM	PM10/PM2.5	SO ₂	VOC	CO	NO _x	HAPs
Existing Source	231.90	72.00	0.08	0.39	4.91	14.02	2.61E-01
New Bulk Products	16.39	7.00	-	-	-	-	-
Total =	248.29	79.00	0.08	0.39	4.91	14.02	2.61E-01
Single Worst HAP =						Hexane	2.49E-01

Potential To Emit of Existing Source & New Bulk Products After Controls (tons/year)							
Operation	PM	PM10/PM2.5	SO ₂	VOC	CO	NO _x	HAPs
Existing Source	90.42	24.29	0.08	0.39	4.91	14.02	2.61E-01
New Bulk Products	2.46	0.65	-	-	-	-	-
Total =	92.88	24.94	0.08	0.39	4.91	14.02	2.61E-01
Single Worst HAP =						Hexane	2.49E-01

Appendix A: Emission Calculations
PM and PM10 Emissions From the Bulk Products Handling Processes

Bulk Products
Company Name: ADM Grain Company
Address: 2350 Broadway Avenue, Evansville, IN 47712
MSOP: 163-28381-00042
Reviewer: Jeff Scull
Date: September 9, 2009

1. Maximum Processing Rate

Bulk Products	(tons/yr)
Total	100,000

2. PTE Calculations

Emissions Unit Description	Maximum Grain Throughput (tons/yr)	PM Emission Factor (lbs/ton)	PM10/PM2.5 Emission Factor (lbs/ton)	Control Device(s)	Collection and Control Efficiency (%)	PTE of PM Before Control (tons/yr)	PTE of PM10/PM2.5 Before Control (tons/yr)	PTE of PM After Control (tons/yr)	PTE of PM10/PM2.5 After Control (tons/yr)
Receiving - Straight Truck	100,000	0.18	0.059	Baghouse	99%	9.0	3.0	0.09	0.03
Internal Handling	100,000	0.061	0.034	Enclosed / Baghouse	99%	3.1	1.7	0.03	0.02
Loadout - Barge*	100,000	0.016	0.029	Baghouse	99%	0.8	1.45	0.01	0.01
Storage - Silos and Bins **	0	0.025	0.0063	-	0%	0.00	0.00	0.00	0.00
Totals						13	6.1	0.1	0.06

Emission factors are from AP 42 Table 9.9.1-1 Particulate Emission Factors for Grain Elevators (3/03)

* Shipping of Bulk Products is only by barge.

**The maximum storage capacity of the source is 20,400 tons (0.68 million U.S. bushels). One U.S. bushels is 60 pounds.

The source will not be storing Bulk Products.

Methodology

Maximum Processing Rate (tons/yr) = Maximum Bulk Product available from supplier.

PTE of PM/PM10/PM2.5 Before Control (tons/yr) = Maximum Throughput (tons/yr) x Emission Factor (lbs/ton) x 1 ton/2,000 lbs

PTE of PM/PM10/PM2.5 After Control (tons/yr) = Maximum Throughput (tons/yr) x Emission Factor (lbs/ton) x 1 ton/2,000 lbs x (1- Control Efficiency (%))

Appendix A: Emission Calculations
Fugitive Dust Emissions - Unpaved Roads
Bulk Products

Company Name: ADM Grain Company
Address City IN Zip: 2350 Broadway Avenue, Evansville, IN 47712
Permit Number: 163-28381-00042
PI# ID: 163-00042
Reviewer: Jeff Scull
Date: September 9, 2009

Unpaved Roads at Industrial Site

The following calculations determine the amount of emissions created by unpaved roads, based on 8,760 hours of use and AP-42, Ch 13.2.2 (12/2003).

Vehicle Information (provided by source)

Type	Maximum number of vehicles	Number of one-way trips per day per vehicle	Maximum trips per day (trip/day)	Maximum Weight Loaded (tons/trip)	Total Weight driven per day (ton/day)	Maximum one-way distance (feet/trip)	Maximum one-way distance (mi/trip)	Maximum one-way miles (miles/day)	Maximum one-way miles (miles/yr)
Vehicle (entering plant) (one-way trip)	1.0	10.5	10.5	45.0	474.2	650	0.123	1.3	473.5
Vehicle (leaving plant) (one-way trip)	1.0	10.5	10.5	19.0	200.2	650	0.123	1.3	473.5
Total			21.1		674.4			2.6	947.0

Average Vehicle Weight Per Trip = 32.0 tons/trip
 Average Miles Per Trip = 0.12 miles/trip

Unmitigated Emission Factor, $E_f = k \cdot [s/12]^a \cdot [(W/3)^b]$ (Equation 1a from AP-42 13.2.2)

	PM	PM10/PM2.5	
where k =	4.9	1.5	lb/mi = particle size multiplier (AP-42 Table 13.2.2-2 for Industrial Roads)
s =	4.8	4.8	% = mean % silt content of unpaved roads (AP-42 Table 13.2.2-3 Sand/Gravel Processing Plant Road)
a =	0.7	0.9	= constant (AP-42 Table 13.2.2-2)
W =	32.0	32.0	tons = average vehicle weight (from Truck Weight & Load xls.)
b =	0.45	0.45	= constant (AP-42 Table 13.2.2-2)

Taking natural mitigation due to precipitation into consideration, Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$

Mitigated Emission Factor, $E_{ext} = E \cdot [(365 - P)/365]$
 where P = 125 days of rain greater than or equal to 0.01 inches (see Fig. 13.2.2-1)

	PM	PM10/PM2.5	
Unmitigated Emission Factor, E_f =	7.49	1.91	lb/mile
Mitigated Emission Factor, E_{ext} =	4.92	1.25	lb/mile
Dust Control Efficiency =	50%	50%	(pursuant to control measures outlined in fugitive dust control plan)

Process	Unmitigated PTE of PM (tons/yr)	Unmitigated PTE of PM10/PM2.5 (tons/yr)	Mitigated PTE of PM (tons/yr)	Mitigated PTE of PM10/PM2.5 (tons/yr)	Controlled PTE of PM (tons/yr)	Controlled PTE of PM10/PM2.5 (tons/yr)
Vehicle (entering plant) (one-way trip)	1.77	0.45	1.17	0.30	0.58	0.15
Vehicle (leaving plant) (one-way trip)	1.77	0.45	1.17	0.30	0.58	0.15
TOTAL	3.54	0.90	2.33	0.59	1.17	0.30

Methodology

Total Weight driven per day (ton/day) = [Maximum Weight Loaded (tons/trip)] * [Maximum trips per day (trip/day)]
 Maximum one-way distance (mi/trip) = [Maximum one-way distance (feet/trip)] / [5280 ft/mile]
 Maximum one-way miles (miles/day) = [Maximum trips per year (trip/day)] * [Maximum one-way distance (mi/trip)]
 Average Vehicle Weight Per Trip (ton/trip) = SUM[Total Weight driven per day (ton/day)] / SUM[Maximum trips per day (trip/day)]
 Average Miles Per Trip (miles/trip) = SUM[Maximum one-way miles (miles/day)] / SUM[Maximum trips per year (trip/day)]
 Unmitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Unmitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Mitigated PTE (tons/yr) = (Maximum one-way miles (miles/yr)) * (Mitigated Emission Factor (lb/mile)) * (ton/2000 lbs)
 Controlled PTE (tons/yr) = (Mitigated PTE (tons/yr)) * (1 - Dust Control Efficiency)

Abbreviations

PM = Particulate Matter
 PM10 = Particulate Matter (<10 um)
 PM2.5 = Particulate Matter (< 2.5 um)
 PTE = Potential to Emit



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Miranda Gerard
ADM Grain Company
4666 Fairies Pkwy
Decatur, IL 62526

DATE: October 2, 2009

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
MSOP
163-28381-00042

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Jeffrey Becker, Responsible Official
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

Mail Code 61-53

IDEM Staff	DPABST 10/5/2009 ADM Grain Company 163-28381-00042 (Final)		Type of Mail: CERTIFICATE OF MAILING ONLY	AFFIX STAMP HERE IF USED AS CERTIFICATE OF MAILING
Name and address of Sender		Indiana Department of Environmental Management Office of Air Quality – Permits Branch 100 N. Senate Indianapolis, IN 46204		

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1		Miranda Gerard ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 (Source CAATS) (CONFIRM DELIVERY)									
2		Jeffrey J Becker VP - US Grain Ops & Engineering ADM Grain Company 4666 Faries Pkwy Decatur IL 62526 (RO CAATS)									
3		Evansville City Council and Mayors Office 1NW MLK Blvd, Rm 302 Evansville IN 47708 (Local Official)									
4		Vanderburgh County Commissioners 1 NW MLK Blvd, Rm 305 Evansville IN 47708 (Local Official)									
5		Mr. Charles L. Berger Berger & Berger, Attorneys at Law 313 Main Street Evansville IN 47700 (Affected Party)									
6		Mr. Randy Brown Plumbers & Steam Fitters Union, Local 136 2300 St. Joe Industrial Park Dr Evansville IN 47720 (Affected Party)									
7		Mr. Don Mottley Save Our Rivers 6222 Yankeetown Hwy Boonville IN 47601 (Affected Party)									
8		Vanderburgh County Health Dept. 420 Milberry Street Evansville IN 47713-1888 (Health Department)									
9		Kim Sherman 3355 Woodview Drive Newburgh IN 47630 (Affected Party)									
10		Mr. John Blair 800 Adams Ave Evansville IN 47713 (Affected Party)									
11		Evansville EPA 100 E. Walnut St. Suite 100, Newsome Center Evansville IN 47713 (Local Official)									
12											
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